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12 UNIVERSITY OF NORTHERN CALIFORNIA FOUNDATION,
13 a nonprofit public benefit corporation

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22 Attorneys for Plaintiffs
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24 UNITED STATES DISTRICT COURT
25
26 NORTHERN DISTRICT OF CALIFORNIA

27 JOHN STALCUP, DENNIS MCGOWAN, and
28 MICHAEL LYSTER,

Plaintiffs,

vs.

DR. Y. KING LIU, and
UNIVERSITY OF NORTHERN CALIFORNIA
FOUNDATION,

Defendants.

) Case No. 11-CV-00002 (JSW)

) Formerly Superior Court Case No. SCV-248621

) **SECOND STIPULATION TO EXTEND
DEADLINE TO RESPOND TO
COMPLAINT AND STIPULATION TO
CHANGE DEADLINE FOR MOTION FOR
REMAND AND PROPOSED ORDER**

) AS MODIFIED HEREIN

) Date: N/A

) Time: N/A

) Courtroom: N/A

) Judge: Hon. Jeffrey S. White

Case No. C 11-00002 (JSW)
SECOND STIPULATION TO EXTEND DEADLINE
TO RESPOND TO COMPLAINT

1 Pursuant to Civil Local Rule 6-1(a), Plaintiffs John Stalcup, Dennis McGowan, and Michael
2 Lyster, and defendants University of Northern California Foundation ("UNCF") and Y. King Liu
3 (Chairman of the Board, University of Northern California Foundation) hereby stipulate and agree to
4 extend the deadline for each defendant to respond to plaintiffs' complaint.

5 On January 3, 2011, defendants removed this action to this Court from the Superior Court of
6 the State of California in and for the County of Sonoma. On January 6, 2011, the parties filed a
7 stipulation that UNCF and Y. King Liu would have until January 24, 2011 to respond to the complaint.
8 On January 20, 2011, the parties have stipulated to further extend the deadline for UNCF and Y. King
9 Liu to respond to the complaint to March 15, 2011.

11 Additionally, the parties have agreed to the following deadlines:

12 Last day for plaintiffs to file a motion for remand is February 18, 2011;


13 Hearing date to be noticed on a motion for remand is March 25, 2011;

14 Hearing date to be noticed on a motion to dismiss is March 25, 2011.

15 Such extension is intended to facilitate the parties' settlement discussions, in an effort to
16 resolve this case in an efficient manner.
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19 SO STIPULATED this 21st day of January, 2011.
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By:


Bruce W. Blakely
FLAXMAN & BLAKELY
Attorney for Plaintiffs

By: /s/ Farah S. Anthony

Farah S. Anthony
HOWREY LLP
Attorneys for Defendant DR. Y. KING LIU and
UNIVERSITY OF NORTHERN CALIFORNIA

It is so ordered, with the exception that any motion must be properly noticed 35 days out from the date it is filed.

January 24, 2011

